NEVADA DIVISION OF ENVIRONMENTAL PROTECTION

FACT SHEET

(pursuant to Nevada Administrative Code 445A.236)

Permittee Name: Ev Con Recycling

3061 North Nellis Boulevard

Las Vegas, NV 89115

Location: 4560 East Hammer Lane

Las Vegas, Clark County, Nevada

Latitude: 36° 15' 30" N Longitude: 115° 04' 30" W Township 19S Range. 62E, NW1/4 Section 32, MDB&M

Permit Number: NEV99009

Flow: 30-Day Average: 0.010 MGD

Daily Maximum: 0.029 MGD

The design flow of the system is 0.029 MGD. Flow will vary with each job/remediation site, and will be limited to a 30-Day average of 0.010 MGD.

General:

Ev Con Recycling operates a mobile, trailer-mounted water treatment system, used in the treatment of hydrocarbon-contaminated water associated with Underground Storage Tank (UST) groundwater remediation and tank rinsing. The treatment system is designed to treat water contaminated with BTEX, TPH, MTBE, and VOC. The system consists of a baffled, air-sparge stripping tank with a hydrogen peroxide metering pump addition point, two (2) liquid phase carbon adsorption vessels, and one (1) gas phase carbon adsorption vessel. The liquid discharge line is fitted with a flow meter, and a sampling port.

The treatment system is based at 4560 E. Hammer Lane, east of Lamb Blvd., and west of Nellis Air Force Base. The portable system may be used at remote sites as well as at the Hammer Lane location. Water treated in the system must meet regulatory/permit limitations, and the permit allows use of the appropriately treated water for the following purposes: storage on the Hammer Lane site for UST rinse water and other industrial uses; discharge as a dust palliative at the Hammer Lane site and at the Silverado Recycling facility at 5001 Range Road in Las Vegas. Water treated off-site in remote locations may be either hauled back to the Hammer Lane facility for possible further treatment and subsequent storage and use, or the responsible party at the remote remediation site may obtain an individual discharge permit for discharge of the treated water to a storm drain or other approved site. Ev Con Recycling has cooperative agreements with Silverado Recycling, as a user of the treated water.

All treated water must meet water quality standards prior to discharge. Only waters contaminated by BTEX, TPH, MTBE and VOC's from petroleum hydrocarbons at UST groundwater remediation sites or tank rinsings shall be treated in this system. No metals or

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chlorinated solvent contaminated waters are to be treated by this system. Treatment of other products that are mixed wastes or hazardous materials are prohibited. No fluids from tanks at facilities such as auto repair shops or similar businesses that may contain other hazardous pollutants such as antifreeze, used oil, metals or paint waste may be treated in this system.

Receiving Water Characteristics:

The groundwater below the Hammer Road site is encountered at approximately 82 feet below surface, and is at an elevation of 1868 feet AMSL. Groundwater flow direction is southwest. Water below the site is reported to be potable. Degradation of groundwater due to operation of the water treatment system and subsequent storage and use of the water is unlikely, since the water is discharged only as a dust palliative. There are no groundwater-monitoring wells associated with this permit.

Effluent Characteristics:

During the term of the current permit, all limited constituents were below appropriate detection levels. During that period, a total of 18 "batches", approximately 20,000 gallons each, have been treated and used for dust suppression. The flow did not exceed the Daily Maximum limit of 29,000 gallons per day. The total reported was 327,282 gallons treated.

Proposed Effluent Limitations:

Parameters	Discharge Limitations		Monitoring Requirements	
	30-Day	Daily	Measurement	Sample
	Average	Maximum	Frequency	Type
Flow (MGD)				
Outfall 001 (fluid treated through mobile	0.010	0.029		
treatment system and stored in				
onsite tanks for tank rinsing and				
other industrial use)	M & R (10)	M & R (10)	Continuous	Meter
Outfall 002 (treated fluid used for onsite dust suppression)	M & R	M&R	Continuous	Meter
Outfall 003 (treated fluid used for dust control	M & R (10)	M & R (10)		
at Silverado Recycling facility)	W & K	W & K		
Outfall 004 (discharges of treated fluid at any	M & R $^{(10)}$	M & R (10)		
other NDEP approved sites)				
Benzene (1) (µg/l)	5	5	Monthly (2)	Discrete
Toluene (1) (µg/l)	100	100	Monthly (2)	Discrete
Total Xylenes (1) (µg/l)	200	200	Monthly (2)	Discrete
Ethylbenzene (1) (µg/l)	100	100	Monthly (2)	Discrete
TPH (3) (4) (mg/l)	1	1	Monthly (2)	Discrete
MTBE (5)(6) (•g/l)	20		Monthly (2)	Discrete
Volatile Organic Compounds (7) (9) (•g/l)	Monitor & Report (11)		Site Specific (2)	Discrete
Semi-Volatile Organic Compounds (8) (9) (•g/l)	Monitor & Report (11)		Site Specific (2)	Discrete

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Footnotes:

- 1. EPA Method 602
- 2. If the discharge from the EV Con Recycling System is permitted under another NDEP discharge permit for a specific site discharging to a storm drain or other site, a log of all monitoring results for that site, the permit number, the Permittee, and the flow shall be compiled by EV Con Recycling and submitted to NDEP Quarterly with the DMR.
- 3. TPH = Total Petroleum hydrocarbons
- 4. EPA Method 8015C
- 5. MTBE = Methyl Tertiary-Butyl Ether
- 6. EPA Method 8260B
- 7. EPA Method 624
- 8. EPA Method 604
- 9. On a site-specific basis, the Permittee shall contact the Project Officer at the Bureau of Corrective Actions (702/486-2857) to determine the types of contaminants at each facility where water is to be treated. If VOC, SEMI-VOC contaminated water is to be treated by the Ev Con Treatment System, the effluent discharge shall be sampled at the system sample port/discharge once at each facility site (Outfall 001) prior to storage, discharge and use, and reported to NDEP quarterly. The requirement for monitoring for these parameters is based on known source conditions, site contamination and water quality data for the site where the subject groundwater to be treated originates.
- 10. M & R = Monitor & Report
- 11. Must meet Maximum Contaminant Level (MCL) for each applicable constituent.

Schedule of Compliance:

The Permittee shall implement and comply with the provisions of the Schedule of Compliance after approval by the Administrator, including in said implementation and compliance, any additions or modifications that the Administrator may make in approving the Schedule of Compliance.

- a. The Permittee shall achieve compliance with the effluent limitations upon issuance of the permit.
- b. Updates to the Operations and Management Manual (O & M) shall be submitted to the Division by **September 30, 2005** for review and approval. The updates shall include a routine maintenance plan with protocols and schedules for carbon replacement and sludge removal to ensure proper operation of the system.

Rationale for Permit Requirements:

The permit limitations on flow are based on the design throughput of the treatment unit. Limitations on organic constituents in the treated effluent ensure protection of the groundwater in the unlikely event of discharge reaching the water table. Limitations on the type of fluid treated ensure that the appropriate treatment prior to discharge.

Proposed Determination:

The Division proposes to issue the renewal permit for a period of five (5) years, subject to specified limitations and requirements.

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Procedures for Public Comment:

The Notice of the Division's intent to issue a permit authorizing the facility to discharge to the groundwater of the State of Nevada, subject to the conditions contained within the permit, is being sent to the **Las Vegas Review-Journal** for publication. The notice is being mailed to interested persons on our mailing list. Anyone wishing to comment on the proposed permit can do so in writing for a period of 30 days following the date of the public notice. The comment period can be extended at the discretion of the Administrator. **All comments must be received by NDEP by 5:00 pm on July 21, 2005.**

A public hearing on the proposed determination can be requested by the applicant, any affected State, any affected interstate agency, the Regional Administrator or any interested agency, person, or group of persons. The request must be filed within the comment period and must indicate the interest of the person filing the request and thee reasons why a hearing is warranted. Any public hearing determined by the Administrator to be held must be conducted in the geographical area of the proposed discharge or any other area the Administrator determined to be appropriate. All public hearings must be conducted in accordance with NAC 445A.238.

The final determination of the Administrator may be appealed to the State Environmental Commission pursuant to NRS 445A.605.

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Bureau of Water Pollution Control

May 2005